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11   UNITED STATES DISTRICT COURT

12   NORTHERN DISTRICT OF CALIFORNIA

13   ADVANCED CODING   ) Case No.   25-80123
     TECHNOLOGIES LLC,   )
14   ) (Related to Pending Out-of-State
) Action: 2:24-cv-00353-JRG in the
              Plaintiff,   ) Eastern District of Texas)
15   )
16   v.   )
) **DECLARATION OF MAYELA C.**
17   GOOGLE LLC,   ) **MONTENEGRO-URCH IN**
) **SUPPORT OF NONPARTY DR.**
) **PIERRE-ANTHONY LEMIEUX'S**
18   Defendant.   ) **MOTION TO QUASH DEPOSITION**
) **SUBPOENA**
19   )
) [Filed concurrently with Notice of
20   ) Motion and Motion to Quash and
) [Proposed] Order]
21   )
) Date: ___To Be Set
22   ) Time: ___To Be Set
) Judge: ___To Be Assigned
23   ) Ctrm: __ To Be Assigned_
)
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                 DECLARATION OF MAYELA C. MONTENEGRO-URCH IN SUPPORT OF
                 NONPARTY DR. LEMIEUX'S MOTION TO QUASH DEPOSITION SUBPOENA

1   I, Mayela C. Montenegro-Urch, hereby declare as follows:

2   1.   I am an attorney licensed to practice law before all courts in the State of

3 California and the United States District Court for the Northern District of California.

4 I am a partner with the law firm of Shook, Hardy & Bacon L.L.P., counsel for

5 nonparty Dr. Pierre-Anthony Lemieux in connection with individual deposition

6 subpoenas issued by Advanced Coding Technologies LLC ("ACT") in connection

7 with its cases against Google and Apple referenced in the Motion to Quash. I have

8 personal knowledge of the facts set forth below, and if called as a witness, I could and

9 would testify competently thereto.

10   2.   Attached as **Exhibit A** is a true and correct copy of the Declaration of

11 Patrick A. Lujin in Support of Dr. Lemieux's Motion to Quash Deposition Subpoena.

12   3.   A true and correct copy of the deposition subpoena to Dr. Lemieux in

13 connection with *Advanced Coding Techs., LLC v. Google LLC*, No. 2:24-cv-00353-

14 JRG is attached as **Exhibit B**.

15   4.   A true and correct copy of the deposition subpoena to Dr. Lemieux in

16 connection with *Advanced Coding Techs., LLC v. Apple Inc*., No. 2:24-cv-00572-JRG

17 is attached as **Exhibit C.**

18   I declare under penalty of perjury under the laws of the State of California and

19 the United States of America that the foregoing is true and correct. Executed this 19th

20 day of May, 2025, at Irvine, California.

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22   By: */s/ Mayela C. Montenegro-Urch*
         Mayela C. Montenegro-Urch

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DECLARATION OF MAYELA C. MONTENEGRO-URCH IN SUPPORT OF
NONPARTY DR. LEMIEUX'S MOTION TO QUASH DEPOSITION SUBPOENA